From: Nancy Rumrill
To: David Albright
Cc: Hudson Slay; Christina Yin; Kate Rao
Subject: Re: agenda for GW106 and Lahaina grant negotiations discussion
Date: 04/29/2011 10:45 AM

David,

FYI, on the additional details on the agenda for Nancy Woo briefing on May 3. I modified and included the details in the e-mail below from Hudson. I talked to Hudson yesterday and he said he would help with this if needed. Do you have edits, additions and other suggestions to include? I think some help in defining our anticipated outcome for each discussion topic might be needed.

Thanks Nancy

Nancy Rumrill
Environmental Engineer
U.S. Environmental Protection Agency, Region 9
Ground Water Office (WTR-9)
Phone (415) 972-3293

▼ Hudson Slay---04/27/2011 11:04:31 PM---Hi Nancy, As I mentioned in our phone call earlier today, I am trying to get some additional detail

From: Hudson Slay/R9/USEPA/US
To: Nancy Rumrill/R9/USEPA/US@EPA
Cc: Christina Yin/R9/USEPA/US@EPA
Date: 04/27/2011 11:04 PM
Subject: agenda for GW106 and Lahaina grant negotiations discussion

---

Hi Nancy,
As I mentioned in our phone call earlier today, I am trying to get some additional detail for the grant negotiation groundwater programs agenda. There are two separate sessions: 1) GW 106 and 2) Lahaina. The purpose of the additional detail is to give Nancy Woo a good idea of what we will be discussing, why and what we hope to gain from the discussion. I spoke with David and we agreed that I would work with you and Kate to add detail to the agendas and then share with him. We would like to have all of this completed before our workgroup meeting on Tuesday.
The type of information we are looking for is below. I have included a few suggestions to get us started based upon the preliminary agendas David provided for these sessions. I will give you a call in the morning and would like to see if we can include additional detail where possible.
Thanks!
Hudson

GW 106, Source Water, LCCs

Brief description: Groundwater 106 grant activities and source water protection efforts
Brief background/context: 106 Ground Water workplan progress, available amount $789,289.1 (4/29/11), SRF status of source water efforts.

Specific discussion items:

- Update of EPA LCC rule implementation efforts
- Review status of ongoing GW106 work (specifically LCMS purchase, status of other unspent grant funds)
- Discuss planning for FY12 grant
- Review status of source water program projects
- Discuss areas where EPA can provide assistance

Anticipated outcome of discussions: Continue to maintain DOH moving forward on projects and discuss resolution of any issues which may delay any of the projects.
Time required: 1 hr
Prep materials: Ground water 106 projects update from DOH and SRF SWP projects update
IFMS Ledger sheet

<u>Lahaina Wastewater Reclamation Facility</u>
Brief description: Coordination with DOH regarding UIC and CWA activities ongoing at this facility.
Brief background/context: EPA has determined that the County of Maui's operation of the Lahaina Wastewater Reclamation Facility (LWRF) may result in a discharge into navigable waters. The County's UIC permit renewal application is subject to the section 401 water quality certification requirement. EPA can not issue the final UIC permit until the 401 process is complete. In order to assess the impact of the LWRF's effluent on the coastal waters and determine applicability to NPDES, EPA has determined that coastal seep sampling and a tracer study is needed. These tasks were first directed to Maui Co. as part of our CWA section 308 request (along with enhanced effluent monitoring). DOH (using 106 GW funds) and Army COE agreed to a cost share agreement and contract out the tracer study to UH. With Maui Co. delaying any commitment to conduct seep sampling, we started exploring the possibility of using additional 106 funds (GW and/or monitoring) to conduct the seep sampling. David Albright spoke with Dan Chang about this at our December meetings. This interaction with DOH has progressed to coordinating with Watson Okubo to work out the seep sampling efforts.

Specific Discussion Items:

- 401 Water Quality Certification:

  Discuss status of DOH information request. DOH did not consult us on when the County would submit additional information in response to the 401 letter.

What is the justification from the County for them to take until March 2012 to develop a monitoring plan? We would like to see a schedule from the County outlining when they will submit the rest of the information, such as any of the required monitoring.
Discuss data gathering for the 401 certification and the seep sampling overlap.

· Tracer study (UH WRRC/Geology & Geophysics)—planning and implementation

Status of contract award
Scheduling issues
Contract deadline: Is there any potential for any lapse between the end of the fiscal year and the contract renewal?

· Seep Sampling Project

The results will help determine whether the effluent discharge at the seeps will exceed the water quality criteria (ie, the numeric pollutant concentrations or narrative requirements) for the coastal waters.
Watson Okubo, CWB, will lead and manage the seep sampling project for DOH. (With assistance from Dan Chang)
Potential contract with M Dailer to assist in seep sampling procedures - decide on scope of her involvement, cost estimate for the work; potential funding mechanisms by purchase order
DOH will coordinate with DLNR/DAR to assist with sample collection.
Cost estimate also needs to be completed for the overall project for 106 grant funding management.
Development of draft sampling and analysis plan for EPA QA office approval
Tentative Sampling Schedule - Start of sampling and monthly thereafter.

· CWA 308 Information Request

EPA has issued a revised section 308 letter to require the County to sample the injected effluent for CWA pollutants. The sampling schedule may be coming on May 15, 2011 (due date). Sampling is to have sufficient overlap with the timing of the seep sampling.

This will help to better target any toxics for seep sample analysis, link the pollutants in the effluent to the same (or related pollutants) pollutants exiting the seeps, and better understand the attenuation of the pollutants exiting the seeps.

· Other topics?

We are pursuing settlement discussions with Maui County on disinfection issues. **ENFORCEMENT CONFIDENTIAL** until a draft Consent Agreement has been public noticed.

Maui County NPDES permit application inquiry - DOH needs to clarify why they would not process an NPDES application if the County submitted one.

Anticipated Outcome of discussion: Coordination and better understanding between DOH and EPA for each topic
Time Required: 1 hour
Prep materials: Initial 401 letter, 401 letter follow up to county extending date